REMARKS

Claims 1, 3-17, and 19-33 are pending in the present application, after the canceling of claims 2 and 18.

It is respectfully submitted that all of the presently pending claims are allowable for at least the following reasons.

Claims 3, 6, 9, 10, 19, 25 and 32 have been amended to correct their dependencies or to correct minor matters of form. No new matters have been added, and the claims as presented are supported by the present application. Approval and entry are respectfully requested.

Claims 1, 3-11, 13-17, 19-27, and 29-32 (claims 2 and 18 having been canceled) stand rejected under 35 U.S.C. § 102(b) as being anticipated by United States Patent No. 5,732,074 to Spaur et al. (the "Spaur" reference).

To reject a claim under 35 U.S.C. § 102, the Office must demonstrate that **each and every claim feature is identically disclosed** in a single prior art reference. (See Scripps Clinic & Research Foundation v. Genentech, Inc., 18 U.S.P.Q.2d 1001, 1010 (Fed. Cir. 1991)). "The identical invention must be shown in as complete detail as is contained in the claim." M.P.E.P. § 2131. Applicants respectfully submit that the "Spaur" reference does not disclose each and every feature of the claimed subject matter.

Independent claim 1 relates to a method for translating a message of a first protocol received by a first driver to a second protocol transmitted by a second driver. The method according to claim 1 as presented includes, among other things, receiving the message from the first driver by a message dispatcher before transmitting the message to a message handler, wherein the message dispatcher selects the message handler from a set of one or more message handlers by consulting a database. The method also includes converting the message received by the first driver to an independent format; transmitting the message from the first driver to a second driver via a message handler; and converting the message received by the second driver in the independent format to the second protocol.

It is respectfully submitted that the "Spaur" reference does not discuss, or even suggest -- let alone identically disclose or describe -- receiving a message from a first driver by a message dispatcher before transmitting the message to a message handler. The "Spaur"

reference also does not identically describe that the message dispatcher selects the message handler from a set of one or more message handlers by consulting a database. The Office Action apparently relies on element 30 of figure 2 of the "Spaur" reference as disclosing the features of claim 2 (now canceled, since these features are now in claim 1). (Office Action; page 3, ll. 18-22). However, the Office Action also relies on element 30 of figure 2 as disclosing a message handler. (Office Action; page 3, ll. 3-5). This position is inconsistent and impossible, as it requires element 30 of the "Spaur" reference to perform the function of the message dispatcher, to transmit a message to the same element 30, in purporting to perform the function of the message handler. Therefore, the Office Action requires that element 30 receive a message and transmit the message to itself, after selecting itself by consulting a database. This interpretation is contrary to the plain meaning of the claims and the specification of the presently claimed subject matter.

Additionally, the database referred to in the Office Action, assertedly data memory 106 and program memory 114, are also both part of element 30. Therefore, element 30 of the "Spaur" reference (which purportedly provides the functions of the claim) receives a message, consults itself to determine where to send the message, and in response transmits the message to itself. This interpretation of the claim, and the "Spaur" reference, deprives the claim of all meaning, and is therefore contrary to the law and reasoning. The "Spaur" reference does not identically disclose (or even suggest) receiving a message from a first driver by a message dispatcher before transmitting the message to a message handler, wherein the message dispatcher selects the message handler from a set of one or more message handlers by consulting a database. Therefore, the "Spaur" reference does not anticipate the subject matter of claim 1as presented.

Furthermore, the Office Action asserts that elements 106 (data memory) and 114 (program memory) of the "Spaur" reference disclose a database as in claim 1. However, there is no indication in the sections of the "Spaur" reference cited in the Office Action that either of elements 106 or 114 is consulted by a message dispatcher for selecting a message handler from a set of one or more message handlers, as in claim 1 as presented. In particular, data memory 106 apparently stores "data that has been generated and is expected to be useful in handling requests or commands." (Spaur; col. 8, ll. 48-49). Similarly, program memory

114 apparently stores "a number of short executable programs." (Spaur; col. 8, ll. 62-63). Neither of these descriptions identically discloses (or even suggests) a database consulted by a message dispatcher for selecting a message handler from a set of one or more message handlers, as in claim 1. For at least the reasons discussed above, withdrawal of the anticipation rejection as to claim 1 is respectfully requested.

Claims 3-11 and 13-16 depend from claim 1 and are therefore allowable for at least the same reasons that claim 1 as presented is allowable.

Claim 17 as presented relates to a system that includes a feature similar to the one described above, namely, a message dispatcher adapted to receive a message from a first driver before transmitting the message to a message handler, wherein the message dispatcher is adapted to select the message handler from a set of one or more message handlers by consulting a database. Therefore, for at least the reasons discussed above, withdrawal of the anticipation rejection as to claim 17 is respectfully requested.

Claims 19-27 and 29-32 depend from claim 17 and are therefore allowable for at least the same reasons that claim 1 as presented is allowable.

Claims 1, 6, 10-17, 22, and 26-32 stand rejected under 35 U.S.C. § 102(a) as being anticipated by "Opening Bluetooth For Technical Tasks - Possibilities And Challenges For Automotive Applications," Bluetooth Conference, 13 June 2000, pp. 1-16, by H. Wunderlich et al. (the Wunderlich reference).

Claims 1 and 17 now include the features of canceled claims 2 and 18, respectively (typographic errors have also been corrected). The "Wunderlich" reference does not identically disclose (or even suggest) receiving a message from a first driver by a message dispatcher before transmitting the message to a message handler, in which the message dispatcher selects the message handler from a set of one or more message handlers by consulting a database, as provided for in the context of claim 1 as presented. Similarly, the "Wunderlich" reference does not identically disclose (or even suggest) a message dispatcher adapted to receive the message from the first driver before transmitting the message to the message handler, wherein the message dispatcher is adapted to select the message handler from a set of one or more message handlers by consulting a database, as in claim 17 as

presented. Therefore, claims 1 and 17 as presented are allowable over the "Wunderlich" reference.

Claims 12, 28, and 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the "Spaur" reference in view of the "Wunderlich" reference.

For a claim to be rejected for obviousness under 35 U.S.C. § 103(a), not only must the prior art **teach or suggest each feature of the claim, but the prior art must also suggest combining the features in the manner contemplated by the claim**. See Northern Telecom, Inc. v. Datapoint Corp., 908 F.2d 931, 934 (Fed. Cir. 1990), cert. denied, 111 S. Ct. 296 (1990); In re Bond, 910 F.2d 831, 834 (Fed. Cir. 1990). The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. M.P.E.P. §2142. To establish a prima facie case of obviousness, the Examiner must show that there is some **suggestion or motivation**, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, **to modify or combine the references** and that, when so modified or combined, the prior art **teaches or suggests all of the claim features**. M.P.E.P. §2143. It is respectfully submitted that these criteria for obviousness are not met here.

Claims 12 and 28 depend from claims 1 and 17 as presented, respectively, and are therefore allowable for at least the same reasons as claims 1 and 17 are allowable, as discussed above, since the secondary reference does not cure the critical deficiencies of the primary reference.

Independent claim 33 relates to a system for translating a message of a Controller Area Network protocol to a Bluetooth protocol, which includes a message dispatcher adapted to receive the message from the first driver before transmitting the message to the message handler, wherein the message dispatcher is adapted to select the message handler from a set of one or more message handlers by consulting a rules database. As explained above, neither the "Spaur" nor the "Wunderlich" reference discloses, or even suggests, this feature, and therefore the claim is allowable over the combination of the references.

For at least the reasons discussed above, withdrawal of the obviousness rejections as to claims 12, 28, and 33 is respectfully requested.

CONCLUSION

It is therefore respectfully submitted that all of the pending claims of the present application are now in condition for allowance. It is therefore respectfully requested that the rejections be withdrawn. Prompt reconsideration and allowance of the present application are therefore respectfully requested.

Respectfully submitted,

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By: _____

Richard L. Mayer
Reg. No. 22,490

KENYON & KENYON
One Broadway
New York, New York 10004
(212) 425-7200

CUSTOMER NO. 26646